

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEMAIN Z. DAVIS,

Defendant.

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Criminal Action No. 08-15 GMS

**RESPONSE OF JEMAIN Z. DAVIS TO PLAINTIFF'S MOTION FOR A
PRELIMINARY ORDER OF FORFEITURE**

In response to plaintiff's motion for a preliminary order of forfeiture, defendant Jemain Z. Davis states as follows:

1. The Court has accepted a Memorandum of Plea Agreement as described by plaintiff.
2. Defendant's liability for the proceeds derived from the offense (\$225,284.87) is "joint and several" with his convicted co-defendants (Stefano Russo and Anthony Lofink).
- 3 Any money judgment entered in this matter should reflect said joint and several liability with the above-named co-defendants.

WHEREFORE, defendant respectfully requests the Court forfeiture reflective of the above-described joint and several liability.

/s/ James J. Haley, Jr. (#2997)
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Dated: April 29, 2008